

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

DOWN TOWN ASSOCIATION, d/b/a  
THE DOWN TOWN ASSOCIATION,

Chapter 11

Case No.: 21-10413 (DSJ)

Debtor.

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**STIPULATION TO EXTEND THE INTERNAL REVENUE SERVICE'S  
TIME TO AMEND ITS PROOF OF CLAIM**

**WHEREAS**, Down Town Association d/b/a The Down Town Association, debtor (the "Debtor") filed a voluntary petition for relief from its creditors under Chapter 11, Subchapter V of Title 11 of the United States Code (the "Bankruptcy Code") on March 4, 2021 (the "Petition Date") in the United States Bankruptcy Court, Southern District of New York; and

**WHEREAS**, the Internal Revenue Service (the "IRS") timely filed a proof of claim on April 2, 2021, in the aggregate amount of \$24,270.00 (the "IRS Claim"), consisting of an Unsecured Priority claim totaling \$11,250.00, and an Unsecured General claim totaling \$13,020.00; and

**WHEREAS**, the IRS requires additional time to receive, review, and process tax forms Debtor claims to have mailed to the IRS in June 2021, to determine whether the IRS Claim should be amended; and

**WHEREAS**, the Debtor intends to move forward with the Plan confirmation on August 15, 2021 and the Plan provides that priority claims will be paid in full, and that the Debtor will object to the IRS Claim; it is

**AGREED AND SO ORDERED THAT:**

1. The deadline for the IRS to amend the IRS Claim is hereby extended to September 30, 2021.
2. The Debtor's time to object to the IRS claim is extended to thirty days after the IRS files any amended claim, or to November 1, 2021, if no amended claim is filed.
3. Nothing contained herein shall limit the Parties' rights to seek further extensions of these dates by agreement or by application to the Court.

Dated: August 3, 2021  
Huntington, New York

**Law Offices of Avrum J. Rosen, PLLC**  
*Attorneys for the Debtor*

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**It is so Ordered:**

Dated: New York, New York  
August 3, 2021

Dated: August 3, 2021  
New York, New York

**AUDREY STRAUSS**  
United States Attorney for the  
Southern District of New York  
*Attorney for the Internal Revenue Service*

By: /s/ Ilan Stein  
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s/ David S. Jones  
Honorable David S. Jones  
United States Bankruptcy Judge